



phone 870.336.3434

1.888.336.4249

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office 2400 Ritter Drive, Jonesboro, AR 72401

Received & Inspected

JUN 29 2015

CONFIDENTIAL FINANCIAL INFORMATION-SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NOS. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

FCC Mail Room

REDACTED-FOR PUBLIC INSPECTION

June 26, 2015

Ms. Marlene Dortch
Secretary of Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: Docket WC Nos. 10-90, 11-42, and 14-58 FCC Form 481

Dear Ms. Dortch:

Please accept for filing the attached four copies of the redacted, FCC Form 481 for Tri-County Telephone Company (SAC 401726). This filing is subject to section 0.549 of the FCC's Rules.

Also included is an extra copy of the redacted filing that I request you to date stamp and return to me in the enclosed, postage paid envelope.

If you have any questions about this or need any additional information, I can be contacted at 870-336-2345 or john.strode@rittercommunications.com.

Sincerely,
RITTER COMMUNICATIONS HOLDINGS, INC.

John Strode
Vice President

attachments

No. of Copies rec'd 0+4
List ABCDE



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**CONFIDENTIAL FINANCIAL INFORMATION-SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90,
07-135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92,
96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208,
BEFORE THE FEDERAL COMMUNICATIONS
COMMISSION**

Received & Inspected

June 26, 2015

JUN 29 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

FCC Mail Room

**Re: WC Docket No. 10-90, WC Docket No. 11-42, WC Docket No. 14-58
2016 ETC Annual Report of Tri-County Telephone Company
Study Area Code 401726
Request for Confidentiality**

Dear Ms. Dortch:

Tri-County Telephone Company (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan") which is contained in the attachment to the 2016 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2020 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2020.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, the Company respectfully requests that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request at 870-336-2345 or john.strode@rittercommunications.com.

Sincerely,
RITTER COMMUNICATIONS HOLDINGS, INC.

A handwritten signature in black ink, reading "John D. Strode". The signature is written in a cursive, flowing style with a large initial "J".

John D. Strode
Vice President

Received & Inspected

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FCC Mail Room


54.313	54.422
Completion Required	Completion Required

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	5	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	401726ar330.pdf	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	401726ar510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	401726ar610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	401726ar1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers			
<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	1	(check to indicate certification)	<input checked="" type="checkbox"/>	
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	

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FOR PUBLIC INSPECTION

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401726
<015>	Study Area Name	TRI-COUNTY TEL CO-AR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Strode
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com

<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

401726ar112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401726
<015>	Study Area Name	TRI-COUNTY TEL CO-ART
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Strode
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com

[illegible]

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

QMS Control No. 3000-DS&S/QMS Control No. 3000-0512
July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

-- See attached worksheet

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

(730) Broadband Price Offerings
 Data Collection Form

FCC Form 481
 CNRS Division No. 10611-0004, CNRS Control No. 1066-0813
 July 2011

<010>	Study Area Code	491726
<015>	Study Area Name	TRI-COUNTY TEL CO-AR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Strode
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext..
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com

[illegible]

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

(800) Operating Companies
 Data Collection Form

FCC Form 481
 OMB Control No. 3080-2996 / OMB Control No. 3062-0825
 July 2013

<010>	Study Area Code	401726
<015>	Study Area Name	TRI-COUNTY TRI-CO-AR
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	John Strode
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362245 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com
<810>	Reporting Carrier	Tri-County Telephone Co.-AR
<811>	Holding Company	E. Ritter Communications Holdings, Inc.
<812>	Operating Company	Tri-County Telephone Co.-AR

[illegible]

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

REDACTED -
FOR PUBLIC INSPECTION

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0381/OMB Control No. 3060-0815
July 2013

<010> Study Area Code 401726
<015> Study Area Name TRI-COUNTY TEL CO-AR
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data John Strode
<035> Contact Telephone Number - Number of person identified in data line <030> 8703362345 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> John.Strode@RitterCommunications.com

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

--

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes
to confirm the status described on the attached document(s), on line 920,
demonstrates coordination with the Tribal government pursuant to
§ 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal
community anchor institutions.
<922> Feasibility and sustainability planning;
<923> Marketing services in a culturally sensitive manner;
<924> Compliance with Rights of way processes
<925> Compliance with Land Use permitting requirements
<926> Compliance with Facilities Siting rules
<927> Compliance with Environmental Review processes
<928> Compliance with Cultural Preservation review processes
<929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

REDACTED -
FOR PUBLIC INSPECTION

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0885/OMB Control No. 3880-0818
July 2013

<010>	Study Area Code	401726
<015>	Study Area Name	TRI-COUNTY TEL CO-AR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Strode
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
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REDACTED -
FOR PUBLIC INSPECTION

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	401726
<015>	Study Area Name	TRI-COUNTY TEL CO-AR
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Strobe
<035>	Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	John.Strobe@RitterCommunications.com

401726ar1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

REDACTED -
FOR PUBLIC INSPECTION

(2000) Price Cap Carrier Additional Documentation Data Collection Form Including Rate-of-Return Carriers affiliated with Price-Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3090-0086/OMB Control No. 3041-0018 July 2013
------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------

<010> Study Area Code	401726
<015> Study Area Name	TXI-COUNTY TEL CO-AR
<020> Program Year	2014
<030> Contact Name - Person USAC should contact regarding this data	JOHN STONER
<035> Contact Telephone Number - Number of person identified in data line <030>	9703382349 WLL
<039> Contact Email Address - Email Address of person identified in data line <030>	JOHN.STONER@TXICOMMUNICATIONS.COM

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
<2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
<2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
<2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
<2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
<2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

--

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
<2018> 5th year Broadband Service Certification
<2019> Interim Progress Certification
<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

--

Name of Attached Document(s) Listing Required Information

DOCKET NO. 09-51, AT DOCKET NO. 10-205, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

DOCKET NO. 09-51, AT DOCKET NO. 10-205, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

401726
TRI-COUNTY TEL CO-AR
2015
John Strode
8703362345 ext.
John.Strode@FitterCommunications.com

(3010) **Progress Report on 5 Year Plan**
Milestone Certification (47 CFR § 54.313(f)(1)(i))

[3011] Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

(Yes/No) ☒ ☐

(Yes/No) ☐ ☒

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

Name of Attached Document Listing Required Information

(Yes/No) ☐ Yes ☐ No

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☒☒

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RJIS Operating Report for Telecommunications Borrowers.

11

401726ar1026.pdf

Name of Attached Document Listing Required Information	Date of Attachment
1. <u>1001</u>	10/1/2011
2. <u>1002</u>	10/1/2011
3. <u>1003</u>	10/1/2011
4. <u>1004</u>	10/1/2011
5. <u>1005</u>	10/1/2011
6. <u>1006</u>	10/1/2011
7. <u>1007</u>	10/1/2011
8. <u>1008</u>	10/1/2011
9. <u>1009</u>	10/1/2011
10. <u>1010</u>	10/1/2011
11. <u>1011</u>	10/1/2011
12. <u>1012</u>	10/1/2011
13. <u>1013</u>	10/1/2011
14. <u>1014</u>	10/1/2011
15. <u>1015</u>	10/1/2011
16. <u>1016</u>	10/1/2011
17. <u>1017</u>	10/1/2011
18. <u>1018</u>	10/1/2011
19. <u>1019</u>	10/1/2011
20. <u>1020</u>	10/1/2011
21. <u>1021</u>	10/1/2011
22. <u>1022</u>	10/1/2011
23. <u>1023</u>	10/1/2011
24. <u>1024</u>	10/1/2011
25. <u>1025</u>	10/1/2011
26. <u>1026</u>	10/1/2011
27. <u>1027</u>	10/1/2011
28. <u>1028</u>	10/1/2011
29. <u>1029</u>	10/1/2011
30. <u>1030</u>	10/1/2011
31. <u>1031</u>	10/1/2011
32. <u>1032</u>	10/1/2011
33. <u>1033</u>	10/1/2011
34. <u>1034</u>	10/1/2011
35. <u>1035</u>	10/1/2011
36. <u>1036</u>	10/1/2011
37. <u>1037</u>	10/1/2011
38. <u>1038</u>	10/1/2011
39. <u>1039</u>	10/1/2011
40. <u>1040</u>	10/1/2011
41. <u>1041</u>	10/1/2011
42. <u>1042</u>	10/1/2011
43. <u>1043</u>	10/1/2011
44. <u>1044</u>	10/1/2011
45. <u>1045</u>	10/1/2011
46. <u>1046</u>	10/1/2011
47. <u>1047</u>	10/1/2011
48. <u>1048</u>	10/1/2011
49. <u>1049</u>	10/1/2011
50. <u>1050</u>	10/1/2011
51. <u>1051</u>	10/1/2011
52. <u>1052</u>	

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN

REDACTED FOR PUBLIC INSPECTION Data Collection Form	DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION Date of this filing: 09/04/2010 Date of this filing: 09/04/2010
-----------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------

<010> Study Area Code	401726
<015> Study Area Name	TRI-COUNTY TEL. CO.-AR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John St.rod
<035> Contact Telephone Number - Number of person identified in data line <030>	8703162145_ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	John.Strod@strodcommunications.com

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends

REDACTED -
FOR PUBLIC INSPECTION

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/01-18 Control No. 3060-0819 July 2013
-----------------------------------------------------------	------------------------------------------------------------------------------------

<010> Study Area Code	401726
<015> Study Area Name	TRI-COUNTY TEL CO-AR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John Strode
<035> Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	John.Strode@RitterCommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	TRI-COUNTY TEL CO-AR
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/26/2015
Printed name of Authorized Officer:	John Strode
Title or position of Authorized Officer:	VP External Affairs
Telephone number of Authorized Officer:	8703362345 ext.
Study Area Code of Reporting Carrier:	401726 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

REDACTED -
FOR PUBLIC INSPECTION

Certification - Agent / Carrier Data Collection Form	FCC Form 482 OMB Control No. 3050-0088/OMB Control No. 3080-0819 July 2013
---------------------------------------------------------	----------------------------------------------------------------------------------

<010> Study Area Code	401726
<015> Study Area Name	TRI-COUNTY TEL CO-AR
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John Strobe
<035> Contact Telephone Number - Number of person identified in data line <030>	8703362345 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	John.Strobe@RitterCommunications.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED -
FOR PUBLIC INSPECTION

CONFIDENTIAL FINANCIAL INFORMATION SUBJECT
TO PROTECTIVE ORDER IN WC DOCKET NOS 10-90, 07-
135, 05-337, 03-109, 14-58, CC DOCKET NO. 01-92, 96-45, GN
DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE
THE FEDERAL COMMUNICATIONS COMMISSION

Attachments

Five-Year Network Improvement Plan and Progress Report
For Tri-County Telephone Company

In its *USF/ICC Transformation Order* and subsequent Orders, the Federal Communications Commission (“FCC” or “Commission”) required Eligible Telecommunications Carriers (“ETCs”) to submit a five-year build-out plan in a manner consistent with Section 54.202(a)(1)(ii) of the Commission’s Rules by July 1, 2014 and to submit annual progress reports thereafter.¹ In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans “should describe the carrier’s network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories.”² Tri-County Telephone Company, Inc. (“Shortened Tri-County Telephone” or the “Company”) is a rate-of-return carrier ETC and hereby submits its annual progress report covering any progress made during the first half of 2015 on the initial five-year network improvement plan submitted in 2014 as well as any updates to the plan made since initial submission of the plan.

I. The Company’s Five-Year Network Improvement Plan

When the Commission adopted its five-year plan requirements for FCC-designated ETCs in its *2005 ETC Order*, it set forth the following criteria as to how the ETC is to describe with

¹ See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-61 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*) at Para. 587; *pets. for review denied, Direct Comm. Cedar Valley, et al v. FCC 11-161*, No. 11-9900 www.ca10.uscourts.gov/opinions/11/11-9900.pdf (10th Cir. filed May 23, 2014); see also *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 12-147 (rel. Feb. 12, 2012) at Para. 5 (amending Section 54.313(a)(1) to clarify this requirement); *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Third Order on Reconsideration, FCC 12-52 (rel. May 14, 2012) at Para. 10 (changing the filing deadline for the annual reports from April 1 to July 1); *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) (“*March 5, 2013 Order*”) at Para’s. 4, 6-9. Delaying Five-year Plan until July 1, 2014 see WC Docket No. 10-90, Order, DA 13-1115, Para. 8 (released May 16, 2013).

² *March 5, 2013 Order* at Para. 9 citing Section 54.202(a)(1)(ii).

“specificity” the proposed improvements or upgrades to the ETC’s network throughout its service area:

(1) how signal quality, coverage, or capacity will improve due to the receipt of high-cost support throughout the area for which the ETC seeks designation; (2) the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; (3) the specific geographic areas where the improvements will be made; and (4) the estimated population that will be served as a result of the improvements.³

In that order, the FCC clarified that service quality improvements in the five-year plan “do not necessarily require additional construction of network facilities.”⁴ Accordingly, the improvements listed in the plan may be projects related to the expansion of the network (one or multiple services), projects related to updating technology to accommodate new services or higher bandwidth or maintenance projects, such as to reduce trouble reports or replace outdated equipment. Additionally, in some cases, the projects may be ones that improve or upgrade the entire network rather than discrete areas within a study area or they may be ones that are ongoing projects that have no specific start and completion dates.

The instructions to the Form 481 state “[r]ecipients may describe where improvements are expected to occur by wire center or census block, as appropriate. To the extent no improvements are planned in specific areas, the five-year plan should so indicate.”⁵ The instructions also require that in subsequent annual progress reports, which must include the total amount of universal support received, this information must be provided “broken out separately by the amount spent on capital expenses and the amount spent on operating expenses.”⁶

³ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“2005 ETC Order”).

⁴ *Id.*

⁵ Instructions for Completing FCC Form 481, OMB Control No. 3060-0986 (High-Cost), OMB Control No. 3060-0819 (Low-Income), July 2013, Line 112.

Accordingly, the Company's five-year plan separately provides both capital expenditures and operating expenses.

A. The Company's Major Network Improvement Projects

Based upon this framework, **Appendix A** updates the Company's five-year plan submitted in 2014 and reflects Tri-County Telephone's major network improvement projects for the calendar years 2015 through 2019⁷ along with the start and completion dates, capital costs, areas and population associated with those projects.

B. How These Projects Will Improve the Network



C. Estimated Capital Expenditures and Operating Expenses

The first table in **Appendix B** included herein specifies the capital expenditures (projects) in **Appendix A**, by Part 32 account, along with the respective year in which the expenditures are expected to occur. In the second table of **Appendix B**, the projected operating expenses are provided, including depreciation expense for both embedded plant investment and for capital expenditures, which begins when the capital expenditures are projected to be placed into service.

II. The Company's Progress Report on its Five-Year Network Improvement Plan

⁶ Instructions for Completing FCC Form 481, OMB Control No. 3060-0986 (High-Cost), OMB Control No. 3060-0819 (Low-Income), July 2013, Line 112.

⁷ The initial five-year network improvement plan covered calendar years 2015 through 2019.

Because the calendar year 2015 is still under way, Tri-County Telephone has no progress to report on the network improvement projects planned for 2015. Comprehensive progress made on network improvements in 2015 will be reported by Tri-County Telephone in its 2016 ETC Annual Report. Tri-County Telephone hereby provides the following required elements of its progress report to satisfy Form 481 reporting obligations.

A. The Amount of Universal Service Support Received by the Company



B. How Tri-County Telephone Company, Inc. Has Used USF to Improve Service Quality, Coverage and Capacity

Section 254(e) of the Communications Act of 1934, as amended requires ETCs to use Universal Service support ("USF") "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."⁸ Pursuant to Section 54.314 of the FCC's rules, in order for state-designated ETCs to receive USF for the coming year, states must annually file certifications by October 1st stating that all federal high-cost support provided to such carriers within the state "was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and

⁸ 47 U.S.C. § 254(e).

services for which the support is intended.”⁹ ETCs not designated by a state must file similar certifications with the FCC.¹⁰

In its *USF/ICC Transformation Order*, the FCC clarified that prior to making the Section 254(e) certifications, states should conduct a “rigorous examination of the factual information” contained in the annual Section 54.313 reports, of which the five-year network improvement plan and annual progress reports are a part, in determining whether they can certify that carriers’ support has been used and will be used only for the purpose for which the support was intended.¹¹ The FCC said that it would also use the reports to verify certifications filed by ETCs that are not state-designated.¹² In this context, the Commission stated, “[i]n light of the public interest obligations we adopt in this Order, a key component of this [Section 254(e)] certification will now be that support is being used to maintain and extend modern networks capable of providing voice and broadband service.”¹³

Essentially, under the existing rules and processes, the federal USF received by the Company and other incumbent rural telephone companies are, in fact, an integral part of the recovery of expenditures of rural incumbent local exchange carriers incurred in the provision, maintenance and upgrading of their provision of facilities and services for which the USF is intended. Tri-County Telephone depends upon its receipt and utilization of federal universal service support to provide rural telephone customers with affordable and quality voice and broadband services.

⁹ 47 C.F.R. § 54.314(a).

¹⁰ 47 C.F.R. § 54.314(b).

¹¹ See *USF/ICC Transformation Order* at Para. 612.

¹² *Id.*

¹³ *Id.* (emphasis supplied).

Accordingly, given the critical role the network improvement plan as updated herein and the progress reports will have in the annual Section 254(e) certification process, Tri-County Telephone's plan and progress reports demonstrate how the Company has used and will use USF not only for improvements and upgrades, but also for the provision and maintenance of the facilities and services to which the support was intended. Even though the FCC did not require the Company to include calendar year 2014 as part of the Company's network improvement plan and thus there is no information to report regarding progress during that year, the Company hereby certifies that during that year it used USF solely for which the support was intended.

C. Maps Depicting the Company's Network Progress

Attached to this Five-Year Network Improvement Plan as **Appendix C** is Tri-County Telephone's maps depicting the extent of the Company's network within its service area and indicating specific geographic areas by broadband deployment.

D. Network Improvement Targets Not Met

Because 2015 is the first year of the Company's network improvement plan, there is no previous year for which to report network improvement targets that have not been fulfilled. The Company will report such information for calendar year 2015 as well as progress towards meeting its targets for that year in its progress report submitted in 2016.